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ex rel. its Department of Corrections and
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10 **UNITED STATES DISTRICT COURT**
11 **DISTRICT OF NEVADA**

13 RON SCHRECKENGOST, an individual,
14 and ELIZABETH WALSH, an individual,

15 Plaintiffs,

16 v.

17 THE STATE OF NEVADA, *ex rel.* the
NEVADA DEPARTMENT OF
18 CORRECTIONS, and PERRY RUSSELL,
an individual,

19 Defendants.

20 Case No. 3:19-cv-00659-MMD-CLB

**STIPULATION, REQUEST, AND
ORDER TO EXTEND TIME FOR
DEFENDANTS TO REPLY TO
PLAINTIFFS' OPPOSITIONS TO
MOTIONS TO DISMISS THE SECOND
AMENDED COMPLAINT
(ECF NO. 76 and ECF NO. 77)**

(FIRST REQUEST)

21 Defendants, STATE OF NEVADA *ex rel.* its DEPARTMENT OF CORRECTIONS and
22 PERRY RUSSELL, and Plaintiffs, RON SCHRECKENGOST and ELIZABETH WALSH,
23 pursuant to LR IA 6-1, LR IA 6-2, by and through their counsel of record, hereby stipulate and
24 agree to a 14-day extension of time, up to and including December 22, 2020, for Defendants to
25 reply to Plaintiffs oppositions (ECF No. 76 and ECF No. 77) that were filed in response to
26 Defendants' motions to dismiss the Second Amended Complaint. Pursuant to this stipulation,
27 the parties request that the Court grant this 14-day extension. The current deadline for
28 Defendants to reply to Plaintiffs' oppositions is December 8, 2020.

1 This is the first request for an extension of time for Defendants to reply to Plaintiffs'
2 oppositions (ECF No. 76 and ECF No. 77) to Defendants' motions to dismiss.

3 Defendants were previously granted an 8-day extension of time for Defendants to
4 respond to Plaintiffs' Second Amended Complaint. ECF No. 6. The Court granted Plaintiffs a
5 21-day extension of time (ECF No. 72), an additional 10-day extension of time (ECF No. 74),
6 and an additional 1-day extension of time (ECF No. 79) to respond to Defendants' motions to
7 dismiss. ECF No. 12; ECF No. 18.

8 This request is based on good cause and not for purpose of delay. Defendants are
9 requesting additional time to file replies to Defendants' oppositions (ECF No. 76 and ECF No.
10 77) to the motion to dismiss the Second Amended Complaint to accommodate defense counsel's
11 pre-existing professional obligations in other legal matters, and because Defendants need
12 additional time to properly prepare their reply to adequately address the numerous and complex
13 legal issues raised in Plaintiffs' Oppositions. Undersigned counsel also needs additional time
14 due to challenges currently created by the COVID-19 pandemic.

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1 Undersigned counsel is spending significant time assisting with child care and his child's school
2 curriculum because the elementary school that his child attends moved to full distance learning
3 for the dates of November 30, 2020 through December 18, 2020.

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5 DATED: December 3, 2020

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7 AARON D. FORD
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9 By: /s/ Brandon R. Price
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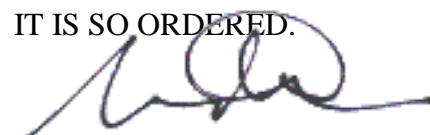
THE GEDDES LAW FIRM, P.C.

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and Elizabeth Walsh

20 **ORDER**

21 IT IS SO ORDERED.

22 
23 UNITED STATES DISTRICT COURT JUDGE

24 Dated: December 4, 2020